

# **Exhibit B**

## **Sworn Declaration of Matthew Mondschein**

1 CHRISTOPHER M. PETERSON  
Nevada Bar No.: 13932  
2 JACOB VALENTINE  
Nevada Bar No.: 16324  
3 **AMERICAN CIVIL LIBERTIES**  
4 **UNION OF NEVADA**  
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5 North Las Vegas, NV 89032  
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9 *Attorneys for Defendant Students for Justice in Palestine UNLV*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 COREY GERWASKI;

13 Plaintiff,

14 vs.

Case No.: 2:24-cv-00985-APG-MDC

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16 STATE OF NEVADA, ex rel. BOARD OF  
17 REGENTS of the NEVADA SYSTEM OF  
18 HIGHER EDUCATION, on behalf of the  
19 UNIVERSITY OF NEVADA, LAS VEGAS;  
20 KEITH WHITFIELD, individually; AJP  
21 EDUCATIONAL FOUNDATION INC., a  
22 California Non-Profit Corporation; STUDENTS  
23 FOR JUSTICE OF PALESTINE-UNLV;  
24 NATIONAL STUDENTS FOR JUSTICE OF  
25 PALESTINE; NEVADANS FOR  
26 PALESTINIAN LIBERATION; DOES I-XX  
27 and ROE entities I-XX,

28 Defendants.

**DECLARATION OF MATTHEW  
MONDSCHIN**

26 I, MATTHEW MONDSCHIN, under penalty of perjury under the laws of the United  
27 States and in accordance with 28 U.S.C. § 1746, declare the following:  
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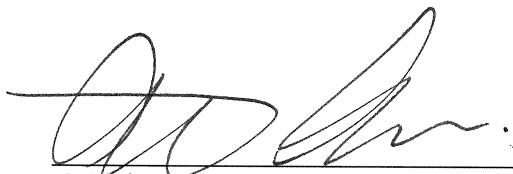
1. I am over eighteen and of sound mind.
2. I have personal knowledge of the facts set forth in this declaration.
3. I make this declaration in support of the above-reference action.
4. In May of 2024, I was the Scheduling Liaison for Students for Justice in Palestine, University of Nevada, Las Vegas (“SJP UNLV”).
5. SJP UNLV is a student organization registered with the University of Nevada, Las Vegas (“UNLV”).
6. On May 7, 2024, I met with then University of Nevada, Las Vegas (“UNLV”) President Keith Whitfield as SJP UNLV’s representative to petition UNLV to take the actions discussed in Paragraphs 10, 11, and 12 of this declaration.
7. UNLV is a public university and Nevada governmental entity.
8. At the time I petitioned President Whitfield, he was president of UNLV.
9. The president of UNLV is an employee of the State of Nevada.
10. First, in my capacity as SJP UNLV’s representative, I petitioned President Whitfield for increased transparency in regards to UNLV’s financial investments and to disclose whether UNLV had invested in companies supporting the Israeli military operations in Gaza.
11. Second, in my capacity as SJP UNLV’s representative, I petitioned President Whitfield for UNLV to financially divest from weapons manufacturing companies and other companies supporting the Israeli military operations in Gaza.
12. Third, in my capacity as SJP UNLV’s representative I petitioned President Whitfield for UNLV to release a statement that UNLV would offer the same protections to Palestinian and Arab students attending the university as offered to Israeli students.

1 13. SJP UNLV petitioned President Whitfield because he was the president of UNLV at the  
2 time and could take the actions of behalf of UNLV that SJP UNLV requested.

3 14. All statements that I made to President Whitfield were true or made without knowledge of  
4 falsity.  
5

6 *I declare under penalty of perjury under the laws of the United States of America that the*  
7 *foregoing is true and correct. See 28 U.S. Code § 1746.*  
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9 Executed on: April 4<sup>th</sup>, 2025  
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12 Matthew Mondschein  
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